

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANGEL F. GARCIA,

Defendant.

4:15CR 3093

INDICTMENT
18 U.S.C. § 2252A(a)(2)
18 U.S.C. § 2252(a)(4)(B)

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

2015 AUG 19 PM 4:56

OFFICE OF THE CLERK

The Grand Jury charges that

COUNT I

From on or about March 8, 2015, and continuing to on or about April 6, 2015, in the District of Nebraska, the defendant, ANGEL F. GARCIA, did knowingly receive and distribute and attempt to receive and distribute, any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and any material that contains child pornography that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT II

On or about April 6, 2015, in the District of Nebraska, ANGEL F. GARCIA, the defendant herein, did knowingly possess and access with intent to view at least one matter which contains any visual depiction that had been mailed, had been shipped and transported using any

means and facility of interstate and foreign commerce, had been shipped and transported in and affecting interstate and foreign commerce, and was produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign commerce, including by computer, the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, including visual depictions involving prepubescent minors or minors who had not attained 12 years of age.

All in violation of Title 18 United States Code Section 2252(a)(4)(B).

FORFEITURE ALLEGATION

Upon conviction for violating an offense involving a visual depiction described in Title 18 U.S.C. § 2252(a), defendant, ANGEL F. GARCIA, shall forfeit to the United States any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violation, including but not limited to the following:

1. Thermaltake tower computer ID W0377NUHI000363;
2. Black Toshiba portable drive, Serial #714FCIUTMC3;
3. Seagate 160 GB portable hard drive, Serial #5MA5EYIJ;
4. Western Digital My Book external hard drive Serial #WCAV53796527;
5. Western Digital My Book external hard drive Serial #WCC4ED521777;
6. HP black table computer;
7. HP black tablet computer;
8. Acer white mini laptop computer Serial #NUSH7AA0073070CF681601;
9. Sony PS4 Serial #MB056588873;
10. iPad air tablet computer;
11. Dell red tablet computer in green case;
12. Toshiba tablet in green case Serial #PDW094-001002;
13. Motorola cell phone;
14. HTC cell phone;
15. Dell black tablet with no case;
16. Western Digital My Book external hard drive Serial #WCAU47038151;

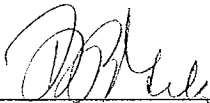
17. Western Digital external hard drive Serial #WCAZA1820812;
18. Western Digital external hard drive Serial #WCAVY3164358;
19. Western Digital TV live media player Serial #WNV194910346;
20. Tablet computer in Unicorn Beetle case;
21. Eleven (11) USB thumb drives;
22. Barracuda 160 GB hard drive Serial #PR13291296;
23. Sandisk 240 GB SSD drive Deepcool tower Serial #144232401452;
24. Tegra Note 7 tablet computer;
25. Seagate external hard drive Serial #NA4J2RHE;
26. Western Digital 80 GB IDE drive removed from black computer tower with no identification information on it Serial #WCAJ93571776;
27. Emachines laptop computer;
28. Seagate 750 GB hard drive Serial #SWS3NGKJ;
29. Zotac minicomputer Serial #G143000001659;
30. Western Digital My Cloud external drive Serial #WCC4E0537164;
31. Western Digital external hard drive Serial #WMC1T1847597;
32. Raspberry PI minicomputer with SD card;
33. Dell laptop in Oakley carry case Serial #3PZURS1;

All in violation of Title 18, United States Code, Section 2253.

A TRUE BILL.

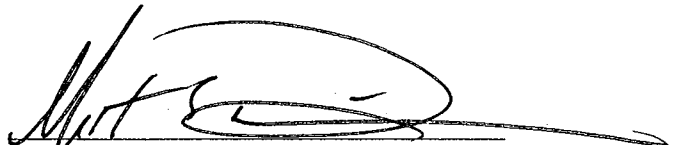


FOREPERSON



DEBORAH R. GILG
United States Attorney
District of Nebraska

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.



MATT E. LIERMAN #22191
Special Assistant U.S. Attorney